REMARKS

In response to the above-identified Office action, Applicants have amended the specification to correct a typographical error and have amended claims 5, 6, 11, 14, 16, 17, 26 and 27 as explained in further detail below. Support for the amendments to the claims is found in the above-identified application at page 9, lines 16-17, page 10, lines 3-21, page 11, lines 1-11, and page 14, lines 13-16. In view of the above amendments and the following remarks, Applicants hereby request further examination and reconsideration of the application, and allowance of claims 5-35.

The Office has noted that the Declaration submitted by Applicants on June 16, 2000 claims benefit under 35 U.S.C. § 120 of U.S. Patent Application Serial No. 09/364,046, but that the specification references U.S. Patent Application Serial No. 09/364,243 as being relied upon for benefit under § 120. Applicants submit that the reference in the specification is a typographical error, and that the correct application is U.S. Patent Application Serial No. 09/364,046 as set forth in the Declaration. Applicants further submit that U.S. Patent Application Serial No. 09/364,046 has at least one common inventor with the above-identified application and that the application was pending at the time the above-identified application was filed. Accordingly, the specification of the above-identified application has been amended to reference the application upon which benefit under § 120 was and is intended to be claimed as discussed above. No new matter is being added by way of this amendment. As such, the Office is requested to enter this amendment and acknowledge the granting of priority for the above-identified application under § 120 to U.S. Patent Application Serial No. 09/364,046.

The Office has required correction of the drawings as set forth in a Form PTO 948 which was sent with the above-identified Office Action. Accordingly, Applicants enclose herewith a set of Formal drawings to remedy the noted deficiencies. As such, the Office is requested to reconsider and withdraw the objections to the drawings.

The Office has requested Applicants to provide a statement that no new matter was submitted in connection with amendments made to the specification which were submitted in the response filed by Applicants on October 1, 2002. Accordingly, Applicants hereby submit that no new matter has been added by way of the amendments submitted in the

response filed on October 1, 2002. Accordingly, the Office is requested to enter the amendments submitted in that response.

The Office has objected to claim 14 asserting that there is no antecedent basis for "the interface system." In response, Applicants have amended claim 14 to correct the antecedent basis problem. Claim 11 has also been amended for the same reason. Support for the subject matter recited in claims 11 and 14 is disclosed in the above-identified application at page 10, lines 14-21. Accordingly, no new matter has been added. In view of the foregoing remarks and amendments, the Office is requested to reconsider and withdraw this objection.

The Office has rejected claims 5-35 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,301,462 to Freeman et al. ("Freeman"). In particular, the Office asserts that Freeman discloses a communication system that receives control data from at least one of the plurality of clients, the control data associated with tasks to be performed for a training exercise (col. 2, line 63 through col. 3, line 3); and a control system configured to access a first set of two or more of the electronic training devices based upon one or more requirements of the training exercise, the control system manipulating the first set of the electronic training devices according to the control data for the training exercise (col. 5, lines 42-61 and col. 6, lines 25-34). In response, Applicants have amended claims 5, 16 and 26, and submit the following remarks.

Freeman does not suggest or disclose, "a device management system that provides low-level commands to the electronic training devices ... to implement functions that change a configuration of the electronic training devices," as recited in claim 5, or "providing low-level commands to the electronic training devices ... to implement functions that change a configuration of the electronic training devices," as recited in claims 16 and 26. Applicants respectfully direct the Office's attention to col. 5, lines 42-62 and FIG. 2 in Freeman, which discloses servers 204 and 231-244 providing clients 201-207 with course content, resources and services, such as e-mail, chat sessions, conferences, accounting, admissions and login, during a teaching process 300. If the Office asserts that the host server 204 and/or the servers 231-244 are the "electronic training devices," then Applicants submit that the clients 201-207 are not "providing low-level commands" to the servers 204 and 231-

244. The clients 201-207 are only sending high-level commands to the servers 204 and 231-244 to interact with high-level content and service providing programs operating on the servers 204 and 231-244, and are not actually changing the servers' configurations. If the Office asserts that the clients 201-207 are the "electronic training devices," then Applicants submit that the servers 204 and 231-244 are simply providing content and services to the clients 201-207 as mentioned above, but are not providing low level commands to change the configurations of the clients 201-207.

In contrast, embodiments of the present invention enable users to actually control low-level functions of devices to actually change the devices' configurations during training exercises, as disclosed at page 10, lines 3-21 through page 11, line 11 in the above-identified application. Further, the system can change the configuration of the user devices 314 depending on the user's actions during a training exercise whereas other systems, such as Freeman, simply have clients that interact with servers only in the manner the servers are programmed to behave. For example, and referring to page 11, lines 5-11 in the above-identified application, a Frame Relay switch may be used to implement a wide area network connection between user devices. Another example is provided at page 14, lines 13-16 in the above-identified application, where the user devices may comprise mechanical shuttles that can move a beaker to different locations, for example, during a training exercise, such as a chemistry lab. Referring now to page 9, lines 16-17 in the above-identified application, allowing devices to be controlled for assignments enables embodiments of the invention to replicate real-world scenarios that other systems, such as Freeman, simply cannot.

In view of the foregoing amendments and remarks, the Office is respectfully requested to reconsider and withdraw the rejections of claims 5, 16 and 26. Since claims 6-15 depend from and contain the limitations of claim 5, claims 17-25 depend from and contain the limitations of claim 16, and claims 27-35 depend from and contain the limitations of claim 26, they are patentable in the same manner as claims 5, 16 and 26.

Additionally, Freeman does not suggest or disclose, "a resource control system ... interpreting the overhead information to manipulate ... a first type and a second type of electronic training devices," as recited in claim 7, or "interpreting ... the overhead information to manipulate ... a first type and a second type of electronic training devices," as recited in claims 18 and 28. If the Office asserts that the servers 231-244 are the first and

second types of "electronic training devices," then Applicants direct the Office's attention to col. 5, lines 10-22 in Freeman and submit that the overhead information is not interpreted by the host 250 for manipulating systems 231-244, but is used to simply identify the host 250. A local terminal server 225 segments data received from clients 201-203 into payload segments and adds the overhead information to the payload segments that are sent to the host 250. The overhead information includes a packet header that further includes a destination address of the host 250, but does not include information for manipulating the different types of systems 231-244. Furthermore, while the systems 231-244 (e.g., e-mail server 241, chat server 242) perform different functions, the systems 231-244 are all the same types of devices.

If the Office asserts that the clients 201-203 are the first and second types of "electronic training devices," then Applicants direct the Office's attention to col. 5, lines 22-30 and submit that the overhead information is not interpreted by the host 250 for manipulating clients 201-203, but is used to simply identify specific clients 201-203. The host 250 segments data to be sent to the clients 201-203 into payload segments and adds overhead information to the payload segments. Here, the overhead information includes a packet header that further includes a destination address identifying the clients 201-203.

Applicants now direct the Office's attention to FIG. 23 and page 29, lines 15-17, in the above-identified application. The embodiments of the present invention employs a common set of instructions that are communicated to and understood by the resource control module 2310 for controlling a number of devices 2318. Referring now to page 31, lines 1-13, in the above-identified application, an operations module 2322 calls the appropriate script for each device based upon the instruction it receives by consulting a database 2344. Device specific details are encapsulated within the scripts. As stated at page 31, lines 1-2 in the application, the resource control module 2310 also enables new devices to be added without requiring major modifications. As a result, the present invention offers a scaleable and configurable mechanism for providing remote access and control of computing resources, and facilitates sharing one set of assets among many users in a timely manner with no manual intervention, as disclosed at page 27, lines 7-8 and lines 15-17 in this application. As such, claims 7, 18 and 28 are patentable over Freeman for this additional reason.

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In accordance with 37 CFR § 1.121, attached hereto is a marked-up copy of the changes made to the specification and claims by the current amendment. The version with markings to show changes made is located in the attached Appendix A.
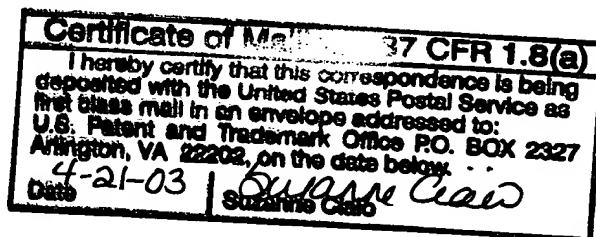
In view of all of the foregoing, it is submitted that this case is in condition for allowance and such allowance is earnestly solicited. In the event that there are any outstanding matters remaining in the above-identified application, the Office is invited to contact the undersigned to discuss this application.

Respectfully submitted,

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Version With Markings to Show Changes Made

In reference to the amendments made herein to the specification and claims 5, 6, 11, 14, 16, 17, 26 and 27, additions appear as underlined text while deletions appear as bracketed text and newly added claims, if any, are enclosed with double dashes, as indicated below:

In The Specification:

The paragraph beginning at page 1, line 1, immediately following the "RELATED APPLICATIONS" heading, has been amended as follows:

This application is a continuation-in-part of U.S. Patent Application Serial No. [09/365,243] 09/364,046 filed July 30, 1999, which is hereby incorporated by reference in its entirety.

In The Claims:

Claims 5, 6, 11, 14, 16, 17, 26 and 27 have been amended as follows:

5.   (Amended) A system for managing a plurality of electronic training devices, the system comprising:

a client communication system that receives control data from at least one of a plurality of clients, the control data associated with tasks to be performed for a training exercise; [and]

a device management system that provides low-level commands to the electronic training devices based on the control data to implement functions that change a configuration of the electronic training devices; and

a control system [configured to access] that accesses a first set of [two or more of] the electronic training devices based upon one or more requirements of the training exercise, the control system manipulating the first set of the electronic training devices according to the control data [for the training exercise] using the device management system.

6.   (Amended) The system as set forth in claim 5 wherein the control system is further configured to access a second set of one or more of the electronic training devices

based upon the requirements of the training exercise, the control system manipulating the first set and the second set of the electronic training devices for the training exercise.

11. (Amended) The system as set forth in claim 10 wherein the first or the second set of the electronic training devices provide one or more results of the at least one instruction execution back to the at least one client through [the] an interface system, the interface system translating the results from a first format understood by the first set or the second set to a second format understood by the at least one client, the communication system transmitting the translated results back to the at least one client.

14. (Amended) The system as set forth in claim 5 wherein [the] an interface system translates the control data from a first format understood by the at least one client to a second format understood by the first set or a second set of the electronic training devices.

16. (Amended) A method for managing a plurality of electronic training devices, the method comprising:

receiving control data from at least one of a plurality of clients, the control data associated with tasks to be performed for a training exercise;

providing low-level commands to the electronic training devices based on the control data to implement functions that change a configuration of the electronic training devices;

accessing a first set of [two or more of] the electronic training devices based upon one or more requirements of the training exercise; and

manipulating the first set of the electronic training devices according to the control data [for the training exercise] using the low-level commands provided to the electronic training devices.

17. (Amended) The method as set forth in claim 16 further comprising accessing a second set of one or more of the electronic training devices based upon the requirements of the training exercise, and manipulating the first set and the second set of the electronic training devices for the training exercise.

26.   (Amended) A computer-readable medium having stored thereon instructions for managing a plurality of electronic training devices, which when executed by one or more processors causes the processors to perform:

receiving control data from at least one of a plurality of clients, the control data associated with tasks to be performed for a training exercise;

providing low-level commands to the electronic training devices based on the control data to implement functions that change a configuration of the electronic training devices;

accessing a first set of [two or more of] the electronic training devices based upon one or more requirements of the training exercise; and

manipulating the first set of the electronic training devices according to the control data [for the training exercise] using the low-level commands provided to the electronic training devices.

27.   (Amended) The medium as set forth in claim 26 further comprising accessing a second set of one or more of the electronic training devices upon the requirements of the training exercise, and manipulating the first set and the second set of the electronic training devices for the training exercise.